

FirstNet gets earful from interest groups: 122 responses to its RFI, 63 on its Public Notice

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If you're planning on building a nationwide LTE network for first responders, you'd better be prepared to hear from a cadre of interest groups. Such is the case for the First Responder Network Authority (FirstNet), which recently closed the comment period on its Public Notice.

Parties as diverse as the Navajo Nation Telecommunications Regulatory Commission and the Association of Flight Attendants-Communications Workers of America, AFA-CIO (AFA) weighed in on the issues, as well as public safety officials, PCIA-the Wireless Infrastructure Association and individual states like Alaska and Hawaii.

In all, FirstNet received 63 responses to the Public Notice and 122 responses to its Request for Information (RFI), a separate proceeding whereby submissions were not made public. The public notice responses [are available here](#).

"This was a success for both FirstNet and our stakeholders," said TJ Kennedy, acting general manager for FirstNet, in a press release. "Many of the items discussed in both the RFI and the Public Notice could have significant impact on the economics of the network and the various solutions proposed by vendors. FirstNet looks forward to thoroughly reviewing and evaluating the responses, as the information will play a significant role in the drafting of the comprehensive network RFP."

The RFI and draft Statement of Objectives (SOO) sought input from industry and stakeholders on some of the key areas that FirstNet is considering before finalizing the draft comprehensive network RFP. The RFI included questions on network buildout, deployment, operations and maintenance, cost considerations and financial sustainability, system hardening, priority and preemption, and general compliance with its enabling legislation.

The Public Notice discussed and sought comment on key provisions of FirstNet's enabling legislation, including core network, radio access network, the definition of a "public safety

entity," substantial rural milestones and fees.

The National Association of State 911 Administrators (NASNA) took the notice to task for not addressing the nexus between the national public safety broadband network and next generation 911 (NG911). "NG911 initiatives are much further along than the FirstNet initiative, with numerous networks already deployed on a statewide and regional basis," the association said. NASNA "respectfully requests that FirstNet include in its RFP a specific requirement that responding suppliers must leverage existing NG911 infrastructure where such would bring clear economic benefits," the association said. "We believe that it would be short-sighted and bad public policy to exclude the relationship between FirstNet and NG911 from the FirstNet RFP."

The Association of Public-Safety Communications Officials-International (APCO) said it strongly disagrees with FirstNet's analysis of the types of nationwide public safety broadband network (NPSBN) users that would fall under the definition of a "public safety entity." APCO says the definition is overly broad and it strongly disagrees that "an electric utility could come within the definition of public safety entity," as suggested.

The definition of "public safety services" also caught the eye of the flight attendant association, which represents 60,000 flight attendants and 19 airlines. It said that flight attendants employed by commercial airlines are first responders with significant public safety responsibilities. FirstNet "must include flight attendants within the scope of non-governmental entities that provide public safety services," the group said, recommending future discussions with FirstNet staff and leadership.

The Navajo Nation Telecommunications Regulatory Commission (NNTRC) said the Navajo Nation, which is the largest native nation in the United States in terms of reservation size, must have a full "seat at the table" when it comes to FirstNet implementations--and communications need to take place direct with the Navajo Nation, not through the states of Arizona, New Mexico and Utah, where it resides. The NNTRC also is concerned about various terms being used to describe "rural" areas and proposed user fees for entities seeking access to the national public safety broadband network.

The state of Alaska also is concerned about the term "rural" and wants to enter into a discussion with FirstNet to create an Alaska-specific definition of "rural" that would meet FirstNet's statutory obligations but in a way that accounts for Alaska's unique circumstances. The state is concerned that FirstNet might feel compelled to put terrestrial systems in very small

communities that may be challenged in paying for access to the public-safety grade network.

Meanwhile, PCIA wants FirstNet to leverage hosting opportunities at existing "macro sites" that include traditional wireless infrastructure like rooftops, towers and other tall vertical structures. It is incumbent upon FirstNet to "adeptly craft requests for proposals and conduct outreach to potential partners to understand the universe of existing infrastructure and elicit infrastructure owner participation," PCIA said.

FirstNet said it will use the responses it receives to the RFI and SOO to refine the acquisition approach and draft a comprehensive network RFP.

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